

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

*Caption in Compliance with D.N.J. LBR 9004-2(c)*

**GENOVA BURNS, LLC**

494 Broad Street

Newark, New Jersey 07102

P: 973.533.0777

Counsel for Creditor Krannich Solar East, LLC

**DONALD W. CLARKE, ESQ.**

In re:

**ORBIT ENERGY & POWER, LLC**

Debtor.

Case No.: 22-19628

Judge: Honorable Andrew B. Altenburg Jr.

Chapter: 7

---

**APPLICATION IN SUPPORT OF ENTRY OF A CONSENT ORDER ALLOWING THE  
GENERAL UNSECURED CLAIM OF CREDITOR KRANNICH SOLAR EAST, LLC**

---

TO: THE HONORABLE ANDREW B. ALTENBURG, JR.  
UNITED STATES BANKRUPTCY JUDGE

Creditor Krannich Solar East, LLC (“Krannich”), by and through its counsel Genova Burns, LLC, respectfully submits this Application in Support of Entry of a Consent Order Allowing the General Unsecured Claim of Creditor Krannich Solar East, LLC and states as follows:

1. On December 6, 2022, Debtor Orbit Energy & Power, LLC filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code.
2. On February 27, 2023, the Court entered the Order Converting Case to Chapter 7 and appointed Andrew Finberg as the Chapter 7 Trustee.
3. On April 4, 2023, Euler Hermes<sup>1</sup>, as agent for Krannich, filed a Proof of Claim asserting a general unsecured claim in the amount of \$400,000.00 (Claim No. 96).

---

<sup>1</sup> Euler Hermes, now known as Allianz Trade, is Krannich’s credit insurer.

4. On July 3, 2023, Krannich subsequently filed an Amended Proof of Claim (Claim No. 134) incorporating the requisite supporting documentation. See *Exhibit A*.

5. On August 30, 2023, Andrew Finberg was removed as Chapter 7 Trustee and Andrew Sklar was appointed as the Successor Trustee.

6. The purpose of this Application is to meet the conditions of Krannich's credit insurer requiring entry of a court order allowing said claim.

7. Andrew Sklar, the Successor Chapter 7 Trustee, has reviewed Krannich's amended claim and has no objection to the allowance of same.

8. This Application and Consent Order has been served on all interested parties, including parties having filed Notices of Appearance and creditors having filed claims.

**WHEREFORE**, Krannich respectfully requests the entry of the Consent Order Allowing the General Unsecured Claim of Krannich Solar East, LLC in the amount of \$400,000.

Respectfully submitted,

**GENOVA BURNS LLC**

Dated: May 31, 2024

By: /s/ Donald W. Clarke  
Donald W. Clarke, Esq.